

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GBM Global Holding Company Limited

*Plaintiff,*

v.

The Unidentified Individuals Listed On Schedule A,

*Defendants.*

Case No.

**EMERGENCY PETITION FOR  
(1) A TEMPORARY  
RESTRAINING ORDER IN AID  
OF ARBITRATION; (2) AN  
ORDER TO SHOW CAUSE  
WHY A PRELIMINARY  
INJUNCTION SHOULD NOT  
ISSUE; AND (3) AN ORDER  
AUTHORIZING  
ALTERNATIVE SERVICE OF  
THE TRO AND SHOW CAUSE  
ORDER**

On July 23, 2021, or as soon thereafter as can be heard, Petitioner GBM Global Holding Company Limited (“Petitioner”), will and does hereby, before a United States District Court Judge, Southern District of New York, 500 Pearl St, New York, NY 10007, petition for an emergency temporary restraining order, as well as a preliminary injunction, pending an arbitration between the parties, as follows:

1. Enjoining Defendants listed in Schedule A to the Memorandum Of Law in Support of the Petition (“Memorandum”) from transferring cryptocurrencies they transferred to certain cryptocurrency exchanges listed in Schedule B to the Memorandum.

The grounds for Plaintiff’s motion are that immediate and irreparable injury will result to Plaintiff absent such a temporary restraining order, as more fully set forth in the Memorandum of Law and supporting Declarations submitted herewith.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant the temporary restraining order requested herein and thereafter, a preliminary injunction

Dated: July 23, 2021.

Angus F. Ni

By: \_\_\_\_\_

**AFN LAW PLLC**

387 Park Ave S, 5th Floor,

New York, NY 10016

(646) 453-7294

angus@afnlegal.com

*Attorneys for Petitioner*